

1 Z. Kathryn Branson, Esq.  
2 Nevada State Bar No. 11540  
3 [kbranson@littler.com](mailto:kbranson@littler.com)  
4 Luke Molleck, Esq.  
5 Nevada State Bar No. 14405  
6 [lmolleck@littler.com](mailto:lmolleck@littler.com)  
7 LITTLER MENDELSON, P.C.  
8 3960 Howard Hughes Parkway  
9 Suite 300  
10 Las Vegas, Nevada 89169.5937  
11 Telephone: 702.862.7730  
12 Fax No.: 702.920.8450

13 Attorneys for Defendant  
14 BARCLAYS SERVICES LLC

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 APRIL MAYS,  
18 Plaintiff,  
19 v.  
20 BARCLAYS, DOES 1 through 100,  
21 inclusive,  
22 Defendant.

23 Case No. 2:23-cv-00952-RFB-DJA

24 **STIPULATION AND ~~PROPOSED~~ ORDER TO  
25 EXTEND TIME FOR DEFENDANT TO FILE  
RESPONSIVE PLEADING**

26 **[SECOND REQUEST]**

27 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff APRIL MAYS (“Plaintiff”) and Defendant  
28 BARCLAYS SERVICES LLC (wrongfully named “Barclays”) (“Defendant”) by and through their  
undersigned counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive  
pleading from the current deadline of August 18, 2023, up to and including **September 1, 2023**.

Such extension is necessary in light of the fact that Defendant’s counsel was recently retained  
and requires the additional time to continue to investigate the allegations in the Complaint. Further,  
an arbitration agreement exists which may affect jurisdiction of this matter, and the parties are  
discussing whether Plaintiff will stipulate to remove this case to arbitration or whether Defendant’s  
counsel will file a motion to compel arbitration.

29 ////

This is the second request for an extension of time to respond to the Complaint. This request is made in good faith and not for the purpose of delay.

Dated: August 16, 2023

Dated: August 16, 2023

Respectfully submitted,

Respectfully submitted,

/s/ Scott B. Olifant  
SCOTT B. OLIFANT, ESQ.

Z. KATHRYN BRANSON, ESQ.  
LITTLER MENDELSON P.C.

*Attorney for Plaintiff*  
**APRIL MAYS**

*Attorneys for Defendant*  
BARCLAYS SERVICES LLC

## IT IS SO ORDERED.

Dated: August 21, 2023.

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE